



State of New Hampshire  
**DEPARTMENT OF ENVIRONMENTAL SERVICES**  
29 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-1370 FAX (603) 271-1381



November 26, 2003

Mr. Stephen Adams, Jr.  
Assistant Airport Director  
Manchester Airport  
One Airport Road  
Manchester, New Hampshire 03103-3395

**CERTIFIED MAIL (7099 3400 0003 0687 2516)**  
**RETURN RECEIPT REQUESTED**

**NOTICE OF PAST VIOLATION**

Dear Mr. Adams:

On May 15, 2003, and May 19, 2003, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at Manchester Airport, in Manchester, New Hampshire. The purpose of the inspection was to evaluate Manchester Airport's compliance status with its State Permits to Operate: FP-S-0007 and PO-B-1921, ("the Permits") and N.H. Admin. Rules Env-A 100 *et seq.* The purpose of this letter is to notify you of the violations discovered during the inspections and subsequent file review, and to document those and other violations that have been identified by DES and that have since been corrected. The specific violations and the corrective actions taken by Manchester Airport are as follows:

1. Env-A 607.01(d) requires the owner of one or more internal combustion engines at a source which combusts liquid fuel oil for which the combined total design gross heat input for all such engines is greater than or equal to 1,500,000 BTUs per hour, or one or more internal combustion engines which combusts natural gas or liquefied propane gas for which the combined total design gross heat input for all such engines is greater than or equal to 10,000,000 BTUs per hour to obtain a temporary permit prior to the installation of the source or device. During the inspections on May 15 and May 19, 2003 DES personnel noted that Manchester Airport had installed and operated four emergency generators with a combined gross heat input greater than 10,000,000 BTU per hour without having first obtained a permit. An application for the generators was filed on June 9, 2003.
2. Env-A 608.10 requires the owner or operator of any stationary source or device that has been issued a state permit to operate to submit an application for a permit renewal 90 days prior to the expiration of the state permit to operate. The Permits expired on February 28, 2002. Manchester Airport submitted its permit application to DES on June 9, 2003.
3. Env-A 704.01 and Section X Emission-Based Fee Requirements of the Permit require Manchester Airport to annually pay emission-based fees for all permitted devices in accordance with Env-A 704.04. Emission fees for each calendar year are due by October 15<sup>th</sup> for the previous calendar year emissions. On September 17, 2003, DES received a payment of \$465.22 from Manchester Airport for calendar years 1999, 2000, 2001 and 2002.
4. Env-A 907.01 and Section VIII Reporting Requirements of the Permit require the owner or operator of any stationary source, area source or device subject to Env-A 600 to submit an annual emissions report which includes the actual emissions of the stationary source and the methods used in calculating such emissions in accordance with Env-A 704.02. The annual emissions report is required to be submitted on or before April 15<sup>th</sup> of the following calendar year. Accordingly, for calendar year 1999, the annual emissions report was required to be submitted on or before April 15, 2000. DES received Manchester Airport's annual emissions reports for calendar years 1999, 2000, 2001 and 2002 on May 27, 2003.

DES believes that no further action in response to the listed violations is required. DES requests that Manchester Airport comply with all reporting obligations and emission limitations contained in its Permit and the rules associated therewith. In the event that other violations are identified, DES may take action relating to those violations including issuing an administrative order, seeking administrative fines, and/or referring this matter to the New Hampshire Department of Justice.

If you believe that DES has cited these violations in error, or if you have any questions regarding this matter, please contact Joseph Ritz at (603) 271-1391. A current copy of the Air Resources Division rules can be obtained from the DES website at <http://www.des.state.nh.us/ard/ardrules.htm>, or by contacting the Public Information Center at (603) 271-2975.

Sincerely,

A handwritten signature in black ink is written over the word "COPY", which is printed in large, bold, black capital letters. The signature appears to be "P. Monroe".

Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

PGM/jwr

cc: M. Harbaugh, NHDES Legal Unit  
R. Kurowski, EPA Region 1  
R. Baines, Mayor, City of Manchester  
M. Carver, The Smart Associates  
AFS# 3301100101